

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**TERRY D. REDMON**

*Plaintiff.*

**V.**

**STONEBRIDGE LIFE INSURANCE  
COMPANY,**

*Defendants.*

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**CIVIL ACTION NO. 4:15-cv-01696**

**PLAINTIFF'S FIRST AMENDED UNOPPOSED MOTION FOR CONTINUANCE**

**TO THE HONORABLE UNITED STATES DISTRICT COURT:**

**COMES NOW** Plaintiff, Terry D. Redmon, and files this First Amended Unopposed Motion for Continuance of the Initial Pretrial and Scheduling Conference currently set for **December 18, 2015** and in support hereof, shows the Court the following:

**I.**

This case is currently set for Initial Pretrial and Scheduling Conference on December 18, 2015 beginning at 9:00 a.m.

**II.**

Plaintiff, Terry D. Redmon seeks a continuance of the Initial Pretrial and Scheduling Conference in this matter. On or about April 22, 2015 Plaintiff, through his attorney of record, properly filed an action in the County Court at Law of Walker County, Texas. On or about June 15, 2015, Defendant, Stonebridge Life Insurance Company, filed its removal arguing complete diversity between the real parties in interest and that the actual amount in controversy at the time of removal exceeds \$75,000.00 (with costs and interests excluded). On or about July 15, 2015, Plaintiff filed his Motion to Remand Pursuant to 28 U.S.C. § 1446 and 1447. The parties are awaiting the Court's

ruling on Plaintiff's Motion to Remand.

Furthermore, Plaintiff's Counsel is involved in a hearing beginning at 10:00 a.m. on December 18, 2015 in Cause No. D12179 *In the Interest of B.K.S., a Child*, In the 87<sup>th</sup> Judicial District of Leon County, Texas.

For these reasons Plaintiff, Terry D. Redmon seeks additional time.


**III.**

This continuance is sought so that justice may be done, and not for purposes of delay. Plaintiff, Terry D. Redmon requests a continuance of the Initial Pretrial and Scheduling Conference currently set for **December 18, 2015** until such time the Court has made its ruling on Plaintiff's pending Motion to Remand Pursuant to 28 U.S.C. § 1446 and 1447.

**WHEREFORE, PREMISES CONSIDERED**, Plaintiff, Terry D. Redmon requests this Court grant this Motion for Continuance of the Initial Pretrial and Scheduling Conference for this case which is currently set for **December 18, 2015** until such time the Court has made its ruling on Plaintiff's pending Motion to Remand Pursuant to 28 U.S.C. § 1446 and 1447 and that Plaintiff receive all such other relief to which he is entitled pursuant to this motion.

Respectfully submitted,

CANTRELL, RAY & BARCUS, LLP

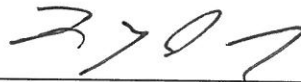
By:   
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ATTORNEY FOR PLAINTIFF,  
TERRY D. REDMON

**CERTIFICATE OF SERVICE**

I certify that a true copy of the above document was filed electronically on the 10<sup>th</sup> day of December, 2015. Parties may access this filing through the court's system. Notice of this filing will be sent to all parties by operation of the court's electronic filing system.

Bernie E. Hauder  
Adkerson, Hauder & Bezney  
1700 Pacific, Suite 4450  
Dallas, Texas 75201



\_\_\_\_\_  
Lanny D. Ray

**CERTIFICATE OF CONFERENCE**

This will confirm that the undersigned counsel for Plaintiff, Terry Redmon conferred with counsel for Defendant, Stonebridge Life Insurance Company, about the foregoing motion. Defendant's counsel represented that he is uopposed with this Motion.



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Lanny D. Ray

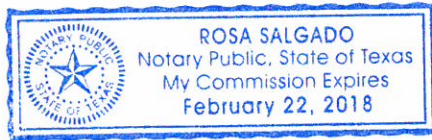
**VERIFICATION**

STATE OF TEXAS                   §  
   §  
COUNTY OF WALKER           §

BEFORE ME, the undersigned Notary Public, on this day personally appeared LANNY D. RAY, who being by me duly sworn on oath deposed and said that the factual assertions contained in paragraph II are true and correct and that he has personal knowledge of these matters.

  
Lanny D. Ray

SUBSCRIBED AND SWORN TO BEFORE ME on this 10<sup>th</sup> day of December, 2015, to certify which witness my hand and seal of office.



  
Notary Public, State of Texas